

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DONALD P. BOLAND and MARY A. BOLAND, Individually and on Behalf of All Others Similarly Situated, : Civil Action No. 1:16-cv-03925-LLS
Plaintiffs, : CLASS ACTION
vs. : LEAD COUNSEL'S NOTICE OF MOTION
GERDAU S.A., et al., : AND MOTION FOR AN AWARD OF
Defendants. : ATTORNEYS' FEES AND EXPENSES AND
: AWARD TO LEAD PLAINTIFF
: PURSUANT TO 15 U.S.C. §78u-4(a)(4)
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Robbins Geller Rudman & Dowd LLP, Court-appointed Lead Counsel and counsel for Lead Plaintiff Policemen's Annuity and Benefit Fund of Chicago will move this Court on October 20, 2017, at 12:00 p.m., before the Honorable Louis L. Stanton, for entry of an order, pursuant to Rules 23 and 54 of the Federal Rules of Civil Procedure: (1) awarding attorneys' fees; (2) paying litigation expenses incurred in prosecuting the Litigation; and (3) awarding Lead Plaintiff compensation for its time and service representing the Class in this action. This motion is based on: (i) the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (ii) the Declaration of Henry Rosen in Support of Lead Plaintiff's Motion for Final Approval of Settlement and Approval of Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii)

the Declaration of Carole K. Sylvester; (iv) the Declaration of Lead Counsel; (v) the Declaration of Lead Plaintiff; (vi) the Stipulation of Settlement; and (vii) all other proceedings herein.

A proposed order will be submitted with Lead Counsel's reply submission on or before October 13, 2017.

DATED: September 22, 2017

Respectfully submitted,

s/ Ellen Gusikoff Stewart

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Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Ellen Gusikoff Stewart, hereby certify that on September 22, 2017, I caused a true and correct copy of the attached:

Lead Counsel's Notice of Motion and Motion for an Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4)

to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filings to all counsel registered to receive such notice.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART